

**BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

**In the Matter of the Accusation Against:**

**Haley Anne Perkins Kaijala, L.M.**

**Licensed Midwife  
Certificate No. LM 540**

**Respondent.**

**Case No. 800-2019-054060**

**DECISION**

**The attached Stipulated Surrender of License and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.**

**This Decision shall become effective at 5:00 p.m. on January 19, 2023.**

**IT IS SO ORDERED January 12, 2023.**

**MEDICAL BOARD OF CALIFORNIA**



**Reji Varghese  
Deputy Director**

1 ROB BONTA  
Attorney General of California  
2 MATTHEW M. DAVIS  
Supervising Deputy Attorney General  
3 JASON J. AHN  
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8 *Attorneys for Complainant*

9  
10 **BEFORE THE**  
11 **MEDICAL BOARD OF CALIFORNIA**  
12 **DEPARTMENT OF CONSUMER AFFAIRS**  
13 **STATE OF CALIFORNIA**

14 In the Matter of the Accusation Against:

Case No. 800-2019-054060

15 **HALEY ANNE PERKINS KAIJALA, L.M.**  
16 **310 Town Center Pkway, #1405**  
17 **Santee, CA 92071**

OAH No. 2022040670

**STIPULATED SURRENDER OF  
LICENSE AND DISCIPLINARY ORDER**

18 **Midwife Certificate No. LM 540**

Respondent.

19  
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of  
24 California (Board). He brought this action solely in his official capacity and is represented in this  
25 matter by Rob Bonta, Attorney General of the State of California, by Jason J. Ahn, Deputy  
26 Attorney General.

27 2. Haley Anne Perkins Kaijala, L.M. (Respondent) is representing herself in this  
28 proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about September 4, 2018, the Board issued Midwife Certificate No. LM 540 to Respondent. The Midwife Certificate No. LM 540 was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2019-054060 and will expire on September 30, 2022, unless renewed.

## JURISDICTION

4. On March 15, 2022, Accusation No. 800-2019-054060 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on or about March 15, 2022. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 800-2019-054060 is attached as Exhibit A and incorporated by reference.

## **ADVISEMENT AND WAIVERS**

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 800-2019-054060. Respondent also has carefully read, and fully understands the effects of this Stipulated Surrender of License and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 8. Respondent admits the truth of each and every charge and allegation in Accusation  
3 No. 800-2019-054060, agrees that cause exists for discipline and hereby surrenders her Midwife  
4 Certificate No. LM 540 for the Board's formal acceptance.

5 9. Respondent understands that by signing this stipulation she enables the Board to issue  
6 an order accepting the surrender of her Midwife Certificate No. LM 540 without further process.

7 **CONTINGENCY**

8 10. Business and Professions Code section 2224, subdivision (b), provides, in pertinent  
9 part, that the Medical Board "shall delegate to its executive director the authority to adopt a . . .  
10 stipulation for surrender of a license."

11 11. This Stipulated Surrender of License and Disciplinary Order shall be subject to  
12 approval of the Executive Director on behalf of the Medical Board. The parties agree that this  
13 Stipulated Surrender of License and Disciplinary Order shall be submitted to the Executive Director  
14 for his consideration in the above-entitled matter and, further, that the Executive Director shall have  
15 a reasonable period of time in which to consider and act on this Stipulated Surrender of License  
16 and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands  
17 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the  
18 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

19 12. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall  
20 be null and void and not binding upon the parties unless approved and adopted by the Executive  
21 Director on behalf of the Board, except for this paragraph, which shall remain in full force and  
22 effect. Respondent fully understands and agrees that in deciding whether or not to approve and  
23 adopt this Stipulated Surrender of License and Disciplinary Order, the Executive Director and/or  
24 the Board may receive oral and written communications from its staff and/or the Attorney General's  
25 Office. Communications pursuant to this paragraph shall not disqualify the Executive Director, the  
26 Board, any member thereof, and/or any other person from future participation in this or any other  
27 matter affecting or involving Respondent. In the event that the Executive Director on behalf of the  
28 Board does not, in his discretion, approve and adopt this Stipulated Surrender of License and

1 Disciplinary Order, with the exception of this paragraph, it shall not become effective, shall be of  
2 no evidentiary value whatsoever, and shall not be relied upon or introduced in any disciplinary  
3 action by either party hereto. Respondent further agrees that should this Stipulated Surrender of  
4 License and Disciplinary Order be rejected for any reason by the Executive Director on behalf of  
5 the Board, Respondent will assert no claim that the Executive Director, the Board, or any member  
6 thereof, was prejudiced by its/his/her review, discussion and/or consideration of this Stipulated  
7 Surrender of License and Disciplinary Order or of any matter or matters related hereto.

#### 8 **ADDITIONAL PROVISIONS**

9 13. This Stipulated Surrender and Disciplinary Order is intended by the parties herein  
10 to be an integrated writing representing the complete, final, and exclusive embodiment of the  
11 agreements of the parties in the above-entitled matter.

12 14. The parties agree that copies of this Stipulated Surrender and Disciplinary Order,  
13 including copies of the signatures of the parties, may be used in lieu of original documents and  
14 signatures and, further, that such copies shall have the same force and effect as originals.

15 15. In consideration of the foregoing admissions and stipulations, the parties agree the  
16 Board may, without further notice to or opportunity to be heard by Respondent, issue and enter  
17 the following Disciplinary Order:

#### 18 **ORDER**

19 IT IS HEREBY ORDERED that Midwife Certificate No. LM 540, issued to Respondent  
20 Haley Anne Perkins Kaijala, L.M. 540, is surrendered and accepted by the Board.

21 1. The surrender of Respondent's Midwife License No. LM 540 and the acceptance of  
22 the surrendered license by the Board shall constitute the imposition of discipline against  
23 Respondent. This stipulation constitutes a record of the discipline and shall become a part of  
24 Respondent's license history with the Board.

25 2. Respondent shall lose all rights and privileges as a licensed midwife in California as  
26 of the effective date of the Board's Decision and Order.

27 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was  
28 issued, her wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 800-2019-054060 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$9,663.50 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 800-2019-054060 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

## ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Midwife Certificate No. LM 540. I enter into this Stipulated Surrender of License and Disciplinary Order voluntarily, knowingly, and intelligently, and fully agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 11/01/2022

HALEY ANNE PERKINS KAIJALA, L.M.  
*Respondent*

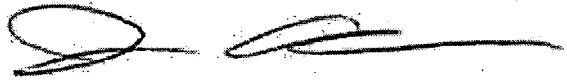
**ENDORSEMENT**

The foregoing Stipulated Surrender of License and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

DATED: November 8, 2022

Respectfully submitted,

ROB BONTA  
Attorney General of California  
MATTHEW M. DAVIS  
Supervising Deputy Attorney General



JASON J. AHN  
Deputy Attorney General  
*Attorneys for Complainant*

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Stipulated Surrender of License and Order.docx

**Exhibit A**

**Accusation No. 800-2019-054060**



1 ROB BONTA  
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2 MATTHEW M. DAVIS  
Supervising Deputy Attorney General  
3 JASON J. AHN  
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10 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 800-2019-054060

13 **HALEY ANNE PERKINS KAIJALA, L.M.**  
14 **4614 1/2 63rd St**  
**San Diego CA 92115-4103**

**ACCUSATION**

15 **Midwife Certificate No. LM 540**

16 Respondent.  
17

18  
19 **PARTIES**

20 1. William Prasifka (Complainant) brings this Accusation solely in his official capacity  
21 as the Executive Director of the Medical Board of California, Department of Consumer Affairs  
22 (Board).

23 2. On September 4, 2018, the Board issued Midwife Certificate No. LM 540 to Haley  
24 Anne Perkins Kaijala, L.M. (Respondent). The Midwife Certificate was in full force and effect at  
25 all times relevant to the charges brought herein and will expire on September 30, 2022, unless  
26 renewed.

27 ///

28 ///

**JURISDICTION**

3. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2507 of the Code states:

(a) The license to practice midwifery authorizes the holder to attend cases of normal pregnancy and childbirth, as defined in paragraph (1) of subdivision (b), and to provide prenatal, intrapartum, and postpartum care, including family-planning care, for the mother, and immediate care for the newborn.

(b) As used in this article, the practice of midwifery constitutes the furthering or undertaking by any licensed midwife to assist a woman in childbirth as long as progress meets criteria accepted as normal.

(1) Except as provided in paragraph (2), a licensed midwife shall only assist a woman in normal pregnancy and childbirth, which is defined as meeting all of the following conditions:

(A) There is an absence of both of the following:

(i) Any preexisting maternal disease or condition likely to affect the pregnancy.

(ii) Significant disease arising from the pregnancy.

(B) There is a singleton fetus.

(C) There is a cephalic presentation.

(D) The gestational age of the fetus is greater than 37 0/7 weeks and less than 42 0/7 completed weeks of pregnancy.

(E) Labor is spontaneous or induced in an outpatient setting.

(2) If a potential midwife client meets the conditions specified in subparagraphs (B) to (E), inclusive, of paragraph (1), but fails to meet the conditions specified in subparagraph (A) of paragraph (1), and the woman still desires to be a client of the licensed midwife, the licensed midwife shall provide the woman with a referral for an examination by a physician and surgeon trained in obstetrics and gynecology. A licensed midwife may assist the woman in pregnancy and childbirth only if an examination by a physician and surgeon trained in obstetrics and gynecology is obtained and the physician and surgeon who examined the woman determines that the risk factors presented by her disease or condition are not likely to significantly affect the course of pregnancy and childbirth.

(3) The board shall adopt regulations pursuant to the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part of 1 of Division 3 of Title 2 of the Government Code) specifying the conditions described in subparagraph (A) of paragraph (1).

(c)(1) If at any point during pregnancy, childbirth, or postpartum care a client's condition deviates from normal, the licensed midwife shall immediately refer or transfer the client to a physician and surgeon. The licensed midwife may consult and remain in consultation with the physician and surgeon after the referral or transfer.

1 (2) If a physician and surgeon determines that the client's condition or concern has been  
2 resolved such that the risk factors presented by a woman's disease or condition are not likely to  
3 significantly affect the course of pregnancy or childbirth, the licensed midwife may resume  
primary care of the client and resume assisting the client during her pregnancy, childbirth, or  
postpartum care.

4 (3) If a physician and surgeon determines the client's condition or concern has not been  
5 resolved as specified in paragraph (2), the licensed midwife may provide concurrent care with a  
6 physician and surgeon and, if authorized by the client, be present during the labor and childbirth,  
and resume postpartum care, if appropriate. A licensed midwife shall not resume primary care of  
the client.

7  
8 (d) A licensed midwife shall not provide or continue to provide midwifery care to a woman  
9 with a risk factor that will significantly affect the course of pregnancy and childbirth, regardless  
of whether the woman has consented to this care or refused care by a physician or surgeon, except  
as provided in paragraph (3) of subdivision (c).

10 (e) The practice of midwifery does not include the assisting of childbirth by any artificial,  
11 forcible, or mechanical means, nor the performance of any version of these means.

12 (f) A midwife is authorized to directly obtain supplies and devices, obtain and administer  
13 drugs and diagnostic tests, order testing, and receive reports that are necessary to his or her  
14 practice of midwifery and consistent with his or her scope of practice.

15 (g) This article does not authorize a midwife to practice medicine or to perform surgery.

16 5. Section 2510 of the Code requires that the licensed midwife, in the event of the  
17 transfer of care to a hospital, provide the relevant medical records and speak with the receiving  
18 physician about labor up to the point of transfer.

19 6. Section 2519 of the Code states, in relevant part:

20 The board may suspend, revoke, or place on probation the license of a midwife  
21 for any of the following:

22 (a) Unprofessional conduct, which includes, but is not limited to, all of the  
following:

23 (1) Incompetence or gross negligence in carrying out the usual functions of a  
24 licensed midwife.

25 "..."

26 (e) Violating or attempting to violate, directly or indirectly, or assisting in or  
abetting the violation of, or conspiring to violate any provision or term of this chapter.

27 "..."

28 ///

(j) Failing to do any of the following when required pursuant to Section 2507:

(1) Consult with a physician and surgeon.

(2) Refer a client to a physician and surgeon.

(3) Transfer a client to a hospital.

7. Section 2234 of the Code states, in pertinent part:

The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

...

(c) Repeated negligent acts. To be repeated, there must be two or more negligent acts or omissions. An initial negligent act or omission followed by a separate and distinct departure from the applicable standard of care shall constitute repeated negligent acts.

(1) An initial negligent diagnosis followed by an act or omission medically appropriate for that negligent diagnosis of the patient shall constitute a single negligent act.

(2) When the standard of care requires a change in the diagnosis, act, or omission that constitutes the negligent act described in paragraph (1), including, but not limited to, a reevaluation of the diagnosis or a change in treatment, and the licensee's conduct departs from the applicable standard of care, each departure constitutes a separate and distinct breach of the standard of care.

"..."

#### COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 9. Respondent has subjected her Midwife Certificate No. LM 540 to disciplinary action  
4 under section 2519, as defined by section 2519, subdivision (a)(1), of the Code, in that  
5 Respondent committed gross negligence in her care and treatment of Patient A<sup>1</sup>, as more  
6 particularly alleged hereinafter:

7 10. On or about February 7, 2019, L.P. spontaneously gave birth to Patient A under the  
8 care of Respondent and her midwifery students, A.E., and B.R. Patient A's newborn  
9 examination on this date was normal with the exception of a possible slight tongue and lip tie.

10 11. On or about February 8, 2019, Respondent and two midwifery students, A.E. and  
11 B.R. returned to Patient A in order to, among other things, complete a California Newborn Screen  
12 (NBS). Respondent was not qualified to serve as a midwifery preceptor. According to the  
13 relevant medical records, P.H., L.M. signed herself as a Supervising Provider. However, P.H.,  
14 L.M. was not present during this visit.

15 12. During the February 8, 2019 visit, A.E. and/or B.R. warmed a disposable diaper in  
16 preparation for a NBS (heel sticks). Respondent felt the diaper was too hot, so she waited, and  
17 instructed A.E. and/or B.R. to place the diaper on Patient A. Respondent is unsure how the diaper  
18 was warmed and/or who filled the diaper. Respondent is also unsure whether she had checked the  
19 diaper's temperature before it was placed on Patient A. Due to the size of the diaper, Patient A's  
20 entire foot was covered by the diaper.

21 13. When the diaper was removed, Respondent noticed blisters on Patient A's foot.  
22 Suspecting a possible staph infection,<sup>2</sup> Respondent lanced the blister, collected some of the fluid  
23 for analysis, but following a phone conversation with P.H., L.M. and Patient A's parents, decided  
24 not to send the fluid. The wound on Patient A's right foot was covered with sterile gauze.  
25 Respondent failed to, among other things, apply any antibiotic ointment and/or take any other

26 \_\_\_\_\_  
27 <sup>1</sup> References to "Patient A" are used in order to protect patient privacy.

28 <sup>2</sup> Staph infection refers to an infection caused by bacteria commonly found on the skin or  
in the nose.

1 necessary and/or appropriate step(s) to prevent further injury.

2 14. On or about February 8, 2019, after the above diaper incident, P.H., L.M. returned to  
3 Patient A's residence to evaluate Patient A's feeding and blisters. After helping with latching and  
4 evaluating Patient A's blisters, P.H., L.M. recommended natural treatment, calendula,<sup>3</sup> and  
5 instructed Patient A's parents to call the doctor if the condition worsened.

6 15. On or about February 9, 2019, P.H., L.M. received photographs of Patient A's  
7 blisters, and relayed the photos to Dr. M. Later that day, P.H., L.M. received a phone call from  
8 Patient A's mother, who was very upset regarding Patient A's condition. P.H., L.M. met Patient  
9 A's mother at the Rady's Oceanside Urgent Care, where Patient A was subsequently transported,  
10 via ambulance, to Rady's Children's Hospital.

11 16. At Rady's Children's Hospital, Patient A was diagnosed with 1% TBSA (total body  
12 surface area) full to superficial/deep partial thickness burn wounds involving entirety of 1<sup>st</sup> and  
13 5th toes and tips of toes 2 ~ 4. Great toe appeared to have full thickness involvement with dry  
14 eschar<sup>4</sup> over wound involving nail bed and joints, deep partial thickness of small toe involving  
15 joints. According to Patient A's admission history and physical examination, she was a normally  
16 presenting three (3) day old infant, with the exception of the burn on her right foot and slight  
17 jaundice. Patient A was provided with antibiotics due to the wound and normal saline for slight  
18 dehydration.

19 17. On or about February 10, 2019, Patient A was admitted to UCSD Hillcrest Burn  
20 Center. Patient A's wounds were debrided and dressed daily under sedation.

21 18. On or about February 16, 2019, Patient A underwent surgery for full debridement and  
22 placement of epiflex.<sup>5</sup> Wounds were full thickness and great toe was down to the bone.  
23 Dressings were changed every other day.

24 ///

25 \_\_\_\_\_  
26 <sup>3</sup> Calendula is a plant used for wound healing, skin health, and more.

27 <sup>4</sup> Eschar refers to dead tissue that eventually sloughs off healthy skin after an injury.

28 <sup>5</sup> Epiflex is a human acellular dermis transplant that is manufactured from skin recovered  
from screened consenting donors according to validated and approved methods.

1 19. On or about February 21, 2019, Patient A was discharged with instructions to return  
2 to the UCSD Hillcrest Burn Center on February 25, 2019 for dressing change.

3 20. Following her February 21, 2019 discharge from USCD Hillcrest Burn Center,  
4 Patient A required numerous follow-up visits to for evaluation. Patient A's parents were advised  
5 to keep Patient A out of the sun for one (1) year. Patient A required a massage, twice a day, with  
6 special lotions and application of MediHoney<sup>6</sup> to decrease thickening of her skin.

7 21. Respondent committed gross negligence in her care and treatment of Patient A,  
8 including, but not limited to, the following:

9 22. Paragraphs 10 through 21, above, are hereby incorporated by reference as if fully set  
10 forth herein;

11 23. Respondent failed to properly ensure that her acts and/or omissions do not place the  
12 client at unnecessary risk;

13 25. Respondent served as a midwifery preceptor without adequate qualifications; and

14 26. Respondent improperly and/or inadequately treated Patient A's blisters on her foot.

15 **SECOND CAUSE FOR DISCIPLINE**

16 **(Repeated Negligent Acts)**

17 27. Respondent has further subjected her Midwife Certificate No. LM 540 to disciplinary  
18 action under section 2519, as defined by sections 2519, subdivision (e), and 2234, subdivision (c),  
19 of the Code, in that Respondent committed repeated negligent acts in her care and treatment of  
20 Patient A, as more particularly alleged hereinafter:

21 28. Paragraphs 9 through 26, above, are incorporated by reference and realleged as if  
22 fully set forth herein.

23 A. Respondent failed to properly ensure that her acts and/or omissions do not place  
24 the client at unnecessary risk;

25 B. Respondent served as a midwifery preceptor without adequate qualifications;  
26 and,

27  
28 <sup>6</sup> Medihoney is a brand name wound and burn gel made from 100% Leptospermum  
(Manuka) honey.

1 C. Respondent improperly and/or inadequately treated Patient A's blisters on her  
2 foot.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Violation of the Medical Practice Act)**

5 29. Respondent has further subjected her Licensed Midwife Certificate No. LM 540 to  
6 disciplinary action under section 2519, subdivision (e) of the Code, in that she has violated or  
7 attempted to violate, directly or indirectly, or assisted in or abetted the violation of, or conspired to  
8 violate a provision of this chapter, as more particularly alleged hereinafter:

9 (a) Paragraphs 9 and 28, above, are hereby incorporated by reference and realleged  
10 as if fully set forth herein.

11 **PRAYER**

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
13 and that following the hearing, the Medical Board of California issue a decision:

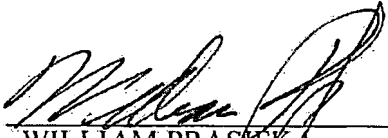
14 1. Revoking or suspending Midwife Certificate Number LM 540, issued to Respondent  
15 Haley Anne Perkins Kaijala, L.M.;

16 2. Ordering Respondent Haley Anne Perkins Kaijala, L.M., to pay the Board's  
17 reasonably incurred costs of investigation and enforcement of this case;

18 3. Ordering Respondent Haley Anne Perkins Kaijala, L.M., if placed on probation, to  
19 pay the Board the costs of probation monitoring; and

20 4. Taking such other and further action as deemed necessary and proper.

21  
22 DATED: **MAR 15 2022**

23   
24 WILLIAM PRASTEK  
25 Executive Director  
26 Medical Board of California  
27 Department of Consumer Affairs  
28 State of California  
*Complainant*